1 Nancy Weng, Esq. Tsao-Wu & Yee, LLP 99 N. 1st Street, Suite #200 2 San Jose, CA 95113 3 (408) 635-2334 (tel) (415) 777-2298 (fax) nweng@tsaoyee.com 4 5 Attorney for Debtor 6 7 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 In re: Case No. 10-59396 Chapter 7 11 Majid Marhamat REQUEST FOR DEFAULT AND ENTRY OF 12 ORDER BY DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) 13 (Sohiel Sazesh dba Baywatch Auto Network) Debtor. 14 15 1. To the clerk: Please enter the default of the claimant or other interested party, 16 described in paragraph 2(A) below, who have failed to object to or otherwise respond to 17 Debtors' Motion herein. 18 2. DECLARATION IN SUPPORT OF REQUEST FOR ORDER BY DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)(Sohiel Sazesh 19 dba Baywatch Auto Network): 20 I, Nancy Weng, am the attorney for the Debtor in the above entitled proceeding, have 21 personal knowledge of the facts herein and can testify competently thereto. I declare the following: 22 A. Copies of the MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 23 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto Network): and NOTICE OF MOTION TO AVOID 24 JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF OPPORTUNITY TO REQUEST HEARING (Sohiel Sazesh dba Baywatch Auto Network) were mailed at Glen Ellen, California 25 to the claimant at the address indicated hereinbelow were served and filed as follows: 26 DATE OF CERTIFIED MAILING: September 28, 2017 27 28

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1 ADDRESSED AS FOLLOWS: Sohiel Sazesh dba Baywatch Auto Network c/o John L. Fallat, Esq. Law Offices of John L. Fallat 3 523 Fourth St., #210 San Rafael, CA 94901 4 5 **ECF TRANSMITTED TO:** Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com 6 7 DATE OF FILING: September 28, 2017 8 B. No request for a hearing has been received from the noticed parties identified hereinabove in paragraph 2(A), above, or from the trustee or any other interested party, by this moving party. 10 C. A copy of this REQUEST FOR DEFAULT AND ENTRY OF ORDER BY DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 11 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto Network) has been served on the above parties and 12 the Chapter 13 Trustee as set forth herein below on the attached Certificate of Service by Mail. 13 E. Declarant herein requests entry of default and default ORDER ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A)(Sohiel Sazesh dba Baywatch Auto 14 Network) against the named creditor. 15 I declare under penalty of perjury under the laws of the State of California that the 16 foregoing is true and correct and that this Declaration was executed in San Jose, California.. 17 Dated: October 26, 2017 /s/ Nancy Weng 18 Nancy Weng, Esq. Attorney for Debtor 19 20 21 22 23 24 25 26 27 28

1	CERTIFICATE OF SERVICE BY MAIL AND ECF TRANSMISSION
2 3	I declare that I am a citizen of the United States and over 18 years of age and not a party to the within case. My business address is 99 N. 1st Street, Suite #200, San Jose, CA 95113. I served a true copy of:
4 5	REQUEST FOR DEFAULT AND ENTRY OF ORDER BY DEFAULT ON MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) (Sohiel Sazesh dba Baywatch Auto Network).
6 7	BY USPS: By first class mail deposited at a depository of the U.S. Postal Service at San Francisco, California on the date noted below and addressed to the parties as set forth below.
8 9 10	Sohiel Sazesh dba Baywatch Auto Network c/o John L. Fallat, Esq. Law Offices of John L. Fallat 523 Fourth St., #210 San Rafael, CA 94901
11 12 13	BY ELECTRONIC TRANSMISSION: I caused to be served the above-described document(s) by means of electronic transmission of the Notice of Electronic Filing through the Court's transmission facilities, to the following parties and/or counsel who are registered ECF users.
14	Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com
15 16	I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this certificate was executed at Glen Ellen, California.
17 18	Dated: October 26, 2017 /s/ Steve Kolkey Steve Kolkey
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